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26 May 1982

Mr. Gerry Armstrong

Dear Mr. Armstrong:

Please be advised that I represent the Church of Scientology. It has come to our attention recently that you currently have in your possession certain pictures, documents, and written materials that you obtained while employed by the Church.

It had been made perfectly clear to you during your employment that the material was the property of the Church of Scientology and that neither you nor anyone outside the Church had any right to see or use the material without the express written consent of the Church. This consent was not given to you.

If you do not immediately return the material and refrain from disseminating it in any manner; I have been instructed to pursue all legal remedies to ensure that you return

EXHIBIT D